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ATTORNEY FOR DEFENDANT JOSEPH DIBEE

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

UNITED STATES OF AMERICA,
Plaintiff,

Case No. 6:06-cr-60011-AA-1

vs.

**DECLARATION OF MATTHEW
SCHINDLER IN SUPPORT OF
UNOPPOSED MOTION TO
CONTINUE TRIAL DATE**

JOSEPH DIBEE,

Defendant(s).

Matthew Schindler, as counsel for defendant Joseph Dibee, does swear under penalty of perjury that the following is true:

1. On June 11, 2020 I was appointed successor counsel to represent Mr. Dibee under the Criminal Justice Act.
2. Mr. Dibee is charged with various federal crimes relating to a series of arsons that took place in the late 1990s and early 2000's.
3. The posture of the case, as well as the underlying facts and circumstances are well known to the court.
4. This is a complex case with operative facts dating back twenty years. Most of counsel's efforts so far have been dedicated to vetting the discovery,

developing a basic understanding of the case, and drafting and filing a substantial release pleading.

5. Counsel needs more time to review discovery, continue to resolve discovery issues, work with the client, conduct investigation, prepare additional motions, and litigate the matter.
6. Counsel has discussed with Mr. Dibee his rights under the Speedy Trial Act. Specifically, we discussed his right to a jury trial within the time limitations set forth in the Act. Being aware of those rights, Mr. Dibee has agreed to waive them to the extent contemplated by this motion.
7. The government has no objection to this request.

Respectfully submitted under penalty of perjury on September 14, 2020.

s/Matthew Schindler

Matthew A. Schindler, OSB#964190
Attorney for Joseph Dibee